

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON TALCUM  
POWER PRODUCTS MARKETING, SALES  
PRACTICES, AND PRODUCTS LIABILITY  
LITIGATION

No. 3:16-md-02738-MAS-RLS

**DEFENDANTS' NOTICE OF MOTION FOR  
LITIGATION FINANCE DISCOVERY  
AND TO COMPEL COMPLIANCE WITH LOCAL RULE 7.1.1**

**PLEASE TAKE NOTICE** that on a date to be determined by the Court, the undersigned counsel will bring Defendants Johnson & Johnson and LLT Management LLC's Motion For Litigation Finance Discovery And To Compel Compliance With Local Rule 7.1.1 before this Court. Defendants will ask for entry of an order permitting the document requests and requiring Beasley Allen to file a statement disclosing the information required under Local Rule 7.1.1.

**PLEASE TAKE FURTHER NOTICE** that in support of their motion, Defendants shall rely upon the Brief submitted herewith and the Declaration of Matthew L. Bush, Esq., together with exhibits, and the arguments and evidence submitted in the original briefing in connection with this litigation finance discovery dispute (*See* ECF Nos. 32827, 32845, 32987, 33085, 33171, 33306); and

**PLEASE TAKE FURTHER NOTICE** that a proposed Order is submitted  
herewith; and

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested.

Dated: May 12, 2025

Respectfully submitted,

/s/ Kristen R. Fournier

Kristen R. Fournier

Matthew L. Bush

**KING & SPALDING LLP**

1185 Avenue of the Americas

34th Floor

New York, NY 10036

(212) 556-2100

kfournier@kslaw.com

/s/ Jessica L. Brennan

Jessica L. Brennan

**BARNES & THORNBURG LLP**

67 E. Park Place, Suite 1000

Morristown, NJ 07960

Tel.: 973-775-6120

jessica.brennan@btlaw.com

*Attorneys for Defendants Johnson &  
Johnson and LLT Management, LLC  
(Predecessor to Red River Talc LLC)*